

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEE  
FOR COMMERCIAL CLAIMS**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR
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**VIA ECF**

October 12, 2020

The Honorable George B. Daniels  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels:

The Plaintiffs' Executive Committee for Commercial Claims writes to request that the Court apply its October 9, 2020 Order at ECF No. 6490 to the Plaintiffs' Executive Committee for Commercial Claims and grant a corresponding extension to file objections to ECF No. 6481. The October 9, 2020 Order (a) extended the time for the Plaintiffs' Executive Committee for Personal Injury and Death Claims to file objections to ECF No. 6481 to November 4, 2020 and (b) adjusted any deadline concerning production of materials to 30 days following a decision on those objections.

Additional time is necessary to allow the Plaintiffs' Executive Committee for Commercial Claims sufficient time to submit their objections, and to have the opportunity, to the extent possible, to coordinate objections with the Plaintiffs' Executive Committee for Personal Injury and Death Claims. The extension also is necessary given the time constraints on counsel resulting from the management of ongoing aspects of this multi-district litigation. The Plaintiffs' Executive Committee for Commercial Claims understands that opposing counsel did not consent to an extension, for the reasons outlined in ECF Nos. 6487 and 6488.

For the reasons set forth herein, and also for those reasons presented to the Court in the request at ECF No. 6487, the Plaintiffs' Executive Committee for Commercial Claims respectfully requests that the Court extend its October 9, 2020 Order at ECF No. 6490 to the Plaintiffs' Executive Committee for Commercial Claims. Plaintiffs thank Your Honor in advance for the Court's attention to this matter.

Hon. George B. Daniels  
October 12, 2020  
Page 2

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Respectfully submitted,

COZEN O'CONNOR



By: J. Scott Tarbutton, on behalf of the  
Plaintiffs' Executive Committee for  
Commercial Claims

cc: All MDL Counsel of Record (via ECF)

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